

AO 91 (Rev. 08/09) Criminal Complaint

## UNITED STATES DISTRICT COURT

for the  
Southern District of Texas

United States of America )  
 Williams ZARCO YOB: 1994 POB: MEXICO, )  
 Fernando SALAZAR-Figueroa YOB: 1987 )  
 POB: Mexico & )  
 Jose ROSALES YOB: 1961 POB: Mexico )

Case No. M-20-2009-M

United States District Court  
Southern District of Texas  
FILED

Defendant(s)

SEP 29 2020

David J. Bradley, Clerk

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of September 28, 2020 in the county of Hidalgo in the  
Southern District of Texas, the defendant(s) violated:

## Code Section

## Offense Description

21 U.S.C. § 841

Did knowingly and intentionally possess with the intent to distribute approximately 62 kilograms of cocaine, a Schedule II controlled substance.

21 U.S.C § 846

Did knowingly Conspire to Possess with Intent to Distribute 62 kilograms of cocaine, a Schedule II controlled substance.

This criminal complaint is based on these facts:

SEE ATTACHMENT "A"

✓ Continued on the attached sheet.

/S/ Juan Flores Jr.

Complainant's signature

Juan Flores Jr. U.S. H.S.I. Special Agent

Printed name and title

Complaint authorized by AUSA Robert J. Guerrero Jr.  
 Submitted by reliable electronic means, sworn to and attested  
 telephonically per Fed.R.Cr.P.4.1, and probable cause found on:

Date:

9/29/20 - 4:04pmCity and state: McAllen, Texas

Judge's signature

U.S. Magistrate Judge Juan Alaniz  
Printed name and title

## ATTACHMENT "A"

In July 2020, Homeland Security Investigations, McAllen, Texas (HSI McAllen) began an investigation into a drug trafficking organization operating in the Rio Grande Valley. During the investigation, agents conducted surveillance of individuals suspected of being involved in the transportation of cocaine from McAllen, Texas to other locations in the United States. On September 28, 2020, agents conducted a consent search of a warehouse and a tractor-trailer located in Pharr, Texas.

The driver of the vehicle granted consent to search his vehicle. With the assistance of the Hidalgo County Sheriff's office, a narcotics detection dog (NDD) alerted to the odor of narcotics in the trailer area of the vehicle. A Mexican male, later identified as Jose ROSALES, granted consent to search the warehouse. Encountered at the warehouse during the consent search were two additional Mexican nationals, identified as Willams ZARCO and Fernando SALAZAR Figueroa.

Based on the detection of narcotics in the vehicle, the tractor-trailer was transported to the Pharr, Texas port of entry for an x-ray inspection of the vehicle. Anomalies were detected in the front area of the trailer. A more intensive inspection of the vehicle yielded to the discovery of 50 bricks with a substance that field tested positive for properties of cocaine. The total weight of the bricks was approximately 62 kilograms.

During the course of the investigation, it was determined the driver of the vehicle had no knowledge of the narcotics in the truck and he was released. ZARCO, SALAZAR and ROSALES were detained and transported to HSI McAllen for further questioning.

HSI Special Agents (SA) agents read ROSALES his Miranda rights and ROSALES waived his rights in writing and elected to speak to the agents. ROSALES stated he was hired by individuals in Mexico to come to McAllen, Texas to witness and verify the arrival of the 50 bricks of cocaine for concealment and transport to locations in the United States. ROSALES stated he arrived in McAllen in July 2020 and since that time had been living with SALAZAR and ZARCO. He stated the warehouse where the consent search was conducted was utilized to comingle the cocaine bricks with a cover load. ROSALES was paid \$500 a week for his work.

HSI SA's read SALAZAR his Miranda rights and SALAZAR waived his rights in writing and elected to speak to the agents. SALAZAR stated he and ZARCO arrived in McAllen, Texas in July 2020. SALAZAR stated they were both there to assist in the facilitation of distributing cocaine from McAllen, Texas to other locations in the United States. SALAZAR informed agents the cocaine was taken to the warehouse on September 26, 2020. He stated the cocaine was concealed in suitcases and taken into the warehouse. SALAZAR stated that the cocaine was then comingled with the cover load and wrapped in plastic cellophane by himself and ZARCO.

During surveillance, agents witnessed ZARCO buying plastic cellophane wrap, packing tape, and gloves at a local business. Agents also witnessed the arrival of the black suitcases carried by ZARCO and SALAZAR arriving and entering the warehouse on September 26, 2020. During the consent search of the warehouse, the same cellophane rolls and tape and gloves were found at the location.

HSI Special Agents (SA) agents read ZARCO his Miranda rights and ZARCO waived his rights in writing and elected to speak to the agents. ZARCO subsequently elected not to make any statements regarding the events in question.